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Attorneys for Plaintiff
DARLENE RAQUEL JOHNS

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DARLENE RAQUEL JOHNS)	Case No.: 1:20-cv-00362-BAM
Plaintiff,)	
v.)	STIPULATION AND ORDER TO
)	EXTEND TIME TO FILE OPENING
ANDREW SAUL,)	BRIEF
Commissioner of Social Security,)	(FIRST REQUEST)
)	
Defendant.)	

Plaintiff Darlene Raquel Johns and Defendant Andrew Saul, Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 28 days from November 5, 2020 to December 3, 2020 for Plaintiff to file its Opening Brief, with all other dates in the Court's scheduling order extended accordingly. This is Plaintiff's first request for an extension. This request is made at the request of Plaintiff's counsel to allow additional time to fully research the issues presented. Counsel requests additional time due to a backlog related to a heavy hearing calendar in September and October, and staffing issues related to Covid-19. Specifically, after a recent

1 change to Social Security Administrations calendaring system, Counsel attended
2 13 hearings in 22 business days in September and 13 hearings in 22 business days
3 in October. Counsel's calendar has returned to normalcy with only seven hearings
4 set for November.

5
6 DATE: November 5, 2020

Respectfully submitted,

7 LAWRENCE D. ROHLFING

8 /s/ *Cyrus Safa*

9 BY: _____

Cyrus Safa

10 Attorney for plaintiff Ms. Darlene Raquel Johns

11
12 DATE: November 5, 2020

13 MCGREGOR W. SCOTT

United States Attorney

14 DEBORAH LEE STACHEL

Regional Chief Counsel

15 Social Security Administration

16 /s/ *Donna W. Anderson*

17 BY: _____

Donna W. Anderson

18 Special Assistant United States Attorney

Attorneys for defendant Andrew Saul

19 Commissioner of Social Security

20 |*authorized by e-mail|

ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for a 28-day extension of time to file her Opening Brief is GRANTED. Plaintiff shall file her Opening Brief on or before December 3, 2020. All other dates in the Court's Scheduling Order are modified accordingly.

The Court notes that the parties filed their stipulation on November 5, 2020, the applicable deadline for Plaintiff's Opening Brief. Counsel is reminded of the obligation to seek to obtain a necessary extension from the Court as soon as the need for the extension becomes apparent. Future requests for Court-approved extensions brought on or after the applicable deadline will be looked upon with disfavor. *See* Local Rule 144(d).

IT IS SO ORDERED.

Dated: November 6, 2020

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE